

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:  
(202) 326-7999

August 30, 2019

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)  
(All Actions)

Dear Judge Netburn:

Saudi Arabia writes in response to Plaintiffs' August 29 letter motion requesting oral argument on Plaintiffs' Motion to Vacate this Court's November 2018 Order. We oppose the motion for three reasons.

First, as explained in our opposition, Plaintiffs' motion to vacate is in all relevant respects a motion for reconsideration of this Court's earlier rulings. Oral argument on motions for reconsideration is strongly disfavored. See Local Civil Rule 6.3.

Second, scheduling oral argument would prolong resolution of a motion that should be resolved without delay so that discovery in this matter can be completed.

Third, due to the heavy reliance in the motion papers on FBI protected material, oral argument would either require closing the courtroom or be artificially restricted and therefore of limited assistance to the Court.

That said, if the Court would find oral argument beneficial we would of course be happy to participate.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: The Honorable George B. Daniels (via facsimile)  
All MDL Counsel of Record (via ECF)